

3 AF 1485

EG&G ROCKY FLATS

EG&G ROCKY FLATS, INC.
ROCKY FLATS PLANT, P.O. BOX 464, GOLDEN, COLORADO 80402-0464 • (303) 966-7000

February 3, 1993

93-RF-1485

Richard J. Schassburger
Acting Director, Environmental Restoration
DOE RFO

Attn: J. Pepe, N. Castaneda

WETLAND IMPACT MITIGATION PLAN FOR INSTALLATION OF TEMPORARY FLUMES FOR
OPERABLE UNIT NOS. 5 AND 6 PHASE I RCRA FACILITY INVESTIGATIONS (RFIs) -
MSB-004-93

The U.S. Environmental Protection Agency, Region VIII (USEPA) has informally required temporary mitigation for impacts to wetland habitat resultant from installation of temporary flumes in streams within Operable Unit Nos. 5 and 6 (OUs 5 and 6). Temporary Parshall flumes are required to provide accurate stream-flow measurement data for the OU 5 and OU 6 RFIs which are based on modeling contaminant fate and transport. Each flume will cover about 15 square feet of stream. Mr. Bradley Miller (USEPA, Water Management Division) has informally requested that this impact to RFP wetlands be temporarily mitigated so that no net loss of wetland habitat will be realized during the OU 5 and OU 6 RFI field activities.

Mr. Miller requested this mitigation in a telephone conversation with Greg Wetherbee (EG&G, Surface Water Division) on January 21, 1993, and Mr. Miller's intent is expressed in his letter to the U.S. Army Corps of Engineers dated January 5, 1993. The letter addressed Clean Water Act Section 404 determination for the flumes. This letter states, "...these projects will require authorization by the EPA's Waste Management Division through the authority of CERCLA."

According to Mr. William Fraser (USEPA), this statement means that it is the Waste Management Division's responsibility to authorize the flume installations under CERCLA, not the Clean Water Act (CWA). Therefore, approval for the flume installations must come from William Fraser or Martin Hestmark (USEPA). In a face-to-face meeting between Mr. Fraser, Jen Pepe, Greg Wetherbee, and Joe Scheffelin (Colorado Department of Health) on January 21, 1993, Mr. Fraser indicated that a DOE/RFO plan and commitment for mitigation of the flume installations is required for those stations located within Operable Units. He further indicated that this plan should be submitted to the Waste Management Division's attention. The Waste Management Division will then consult with Mr. Miller.

Mr. Miller indicated that the mitigation plan does not have to follow any specific format, nor does it have to satisfy all of the requirements of the CWA Section 404 (b) 1 Guidelines.

According to Mr. Miller, the following elements are required in the plan.

1. One for one mitigation of impacted habitat (in square feet).

ADMIN RECORD

A-0005-000122

REVIEWED FOR CLASSIFICATION/UCNI
BY G. T. Ostdiek *8-10*
DATE 3-3-93

Richard J. Schassburger
February 3, 1993
93-RF-1485
Page 2

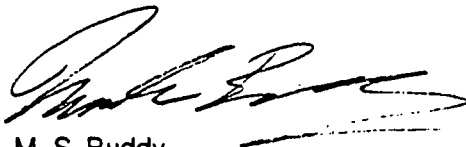
2. Mitigation for temporary structures must occur soon after installation.
3. Mitigation for permanent structures must be planned and committed to, but mitigation must occur only in a "reasonable" time frame.
4. Mitigation measures include, but are not limited to:
 - a. Excavation of stream bank to make more wet surface area.
 - b. Backing up water with riprap material.
 - c. Revegetation.

With this knowledge of the requirements for preparation of wetland mitigation plans, the Surface Water Division (SWD) of Environmental Protection Management prepared the enclosed document: "Strategy for Wetland Impact Mitigation for Installation of Temporary Streamflow Measurement Devices for Environmental Monitoring and Restoration at the Rocky Flats Plant, February, 1993." This wetland impact mitigation plan is for your subsequent transmittal to the USEPA Waste Management Division for approval.

The temporary flumes should be installed no later than April 1, 1993 in order to complete the surface water monitoring tasks for the OU 5 and OU 6 Phase I RFIs on schedule. Therefore, the mitigation plan should be submitted to the USEPA as soon as possible.

A second wetland mitigation plan is currently being prepared by the SWD in a proactive attempt to expedite installation of permanent flumes and gaging stations this summer. This plan will be submitted to Mr. Mark Vanderpuy as soon as it is completed.

Please contact G. A. Wetherbee of the Surface Water Division at extension 8685 if you have questions regarding the enclosed wetland mitigation plan.



M. S. Buddy
Acting Director
Remediation Project Management
EG&G Rocky Flats, Inc.

GAW:dmf

Orig. and 1 cc - R. J. Schassburger

Enclosures:
As Stated